

# EXHIBIT B - Eric Warnders Declaration

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KEVIN CAMPBELL,

Plaintiff,

DECLARATION OF  
ERIC J. WARNDERS

-against-

FEDERAL EXPRESS CORPORATION a/k/a  
FEDEX EXPRESS, and ERIC WANDERS,  
INDIVIDUALLY,

Civil Action No. 1:22-cv-07662-DL

Defendants.  
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I, Eric J. Warnders, declare under penalty of perjury, and pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am over the age of eighteen and have been employed by Defendant Federal Express Corporation (“FedEx”) as Senior Manager Station Operations/AAA, Station Operations/LaGuardia (LGA) since September 16, 2018.

2. The following facts are within my personal knowledge, and if called as a witness, I could and would competently testify thereto. I reserve the right to supplement my testimony at the time of hearing or trial.

3. As Senior Manager Station Operations/AAA at LGA, my duties include, but are not limited to, managing the operations of approximately 10 managers and over 200 employees.

4. Plaintiff Kevin Campbell became employed with FedEx after FedEx acquired Campbell’s previous employer, TNT.

5. When FedEx acquired TNT, Campbell did not have a driver’s license and was, therefore, hired as a Courier/Non-Driver.

6. Campbell was the only Courier at the LGA station who did not have a driver's license.

7. Campbell is the only employee at the LGA station who I am aware of who has ever worked as Courier and did not have a driver's license.

8. Angela Lorenzi is s Senior Service Agent at LGA, which is non-management position.

9. The employee involved in the altercation with Plaintiff Kevin Campbell at the LGA station on May 18, 2021 was Augusto Alzate, who is Hispanic.

10. The LGA station is very racially diverse. The racial demographics of the station on the date of Campbell's hire, the date of Campbell's termination, and as of today are listed below:

**4/12/2017, Total employees 223**

Indian or Alaska Native- 1

Asian – 8

African American- 65

Hispanic-76

Two or More Races -3

Native Hawaiian or Other Pacific Islander - 1

White- 67

Not Specified – 2

**5/25/2021, Total employees 306**

Indian or Alaska Native- 1

Asian – 17

African American- 92

Hispanic-131

Two or More Races -5

White- 56

Not Specified - 4

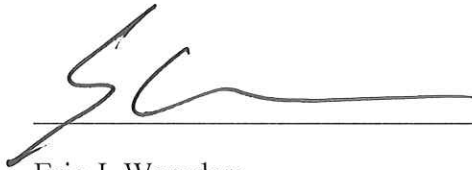
**11/14/2024, Total employees 243**

Indian or Alaska Native- 1

Asian – 15  
African American- 74  
Hispanic-100  
Two or More Races -6  
Native Hawaiian or Other Pacific Islander - 1  
White- 41  
Not Specified – 5

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED, this the 18<sup>th</sup> day of November 2024.

A handwritten signature in black ink, appearing to be 'EW', is written over a horizontal line.

Eric J. Warnders  
Federal Express Corporation  
Senior Manager Station Operations/AAA